### UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

LIBERTY PATENTS, LLC.,

Plaintiff,

v.

LENOVO GROUP LIMITED, ET AL.,

Defendants.

Case No. 2:20-cv-314-JRG-RSP (Lead Case)

**JURY TRIAL DEMANDED** 

# JOINT MOTION TO STAY ALL DEADLINES PENDING SETTLEMENT AS TO PANASONIC CORPORATION OF NORTH AMERICA

Plaintiff Liberty Patents, LLC ("Liberty Patents") and Defendant Panasonic Corporation of North America ("Panasonic") hereby notify the Court that the parties have reached an agreement in principle, which would resolve all matters in controversy between them in the above-captioned action. Accordingly, Liberty Patents and Panasonic file this joint motion for a stay of all deadlines for forty-five (45) days, so that the parties can finalize their settlement agreement and appropriate dismissal papers may be submitted. Liberty Patents and Panasonic request this stay, not for purpose of delay, but that they might finalize and file dismissal papers without incurring additional expense.

Dated: January 21, 2021 Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on 21st day of January 2021, the above document was filed with the Clerk of Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Zachariah S. Harrington
Zachariah S. Harrington